

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**NASHVILLE, TENNESSEE**

IN RE: PETITION OF UNITED CITIES GAS  
COMPANY FOR APPROVAL OF A  
TRANSPORTATION GAS SERVICE  
AGREEMENT WITH SUPERIOR  
INDUSTRIES INTERNATIONAL, INC.

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OFFICE OF THE  
EXECUTIVE SECRETARY  
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DOCKET NO. 00-01022

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**PETITIONER'S RESPONSE TO  
TRA DATA REQUEST NO. 3**

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United Cities Gas Company, by and through counsel, submits this response to TRA Data Request No. 3, dated February 15, 2001.

1. **Is Superior Industries planning to use United Cities as a backup in case more gas than they have contracted for is needed?**

**RESPONSE:** No, Superior is not planning to use United Cities as a backup if more gas than they have contracted for is needed. Superior's marketer will be delivering all of their gas needs.

1(b). **I know United Cities is not going to reserve any capacity for them, so is it correct to say that the only gas United Cities would sell to them would be excess capacity? Would the cost of this gas be at the standard interruptible rate?**

**RESPONSE:** United Cities is not selling, but transporting gas to Superior. The only gas transported and delivered to Superior will be through unused released capacity. As such, the only charge United Cities will bill Superior is the negotiated transportation/delivery (margin) rate

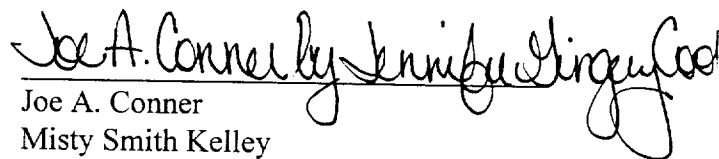
on all volumes metered to their facility. The only scenario in which United Cities would bill Superior for cost of gas would be if during a critical or peak day (under an operational flow order), United Cities could not confirm Superior's marketer's delivery of gas to United Cities City Gate. If Superior then used more than the confirmed quantity amount, United Cities would bill Superior the negotiated rate times all volumes metered plus \$2.50/Ccf for the unauthorized overrun and the cash out rate on all overrun values.

2. In your response on page 32, under item 1, United Cities mentions "Stranded Cost." How much is the "Stranded Cost?"

**RESPONSE:** Attached hereto and filed under seal as Exhibit A is a responsive document from United Cities which explains the calculation of Stranded Cost.

Respectfully submitted,

BAKER, DONELSON, BEARMAN  
& CALDWELL, P.C.



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Attorneys for United Cities Gas Company

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been mailed, postage prepaid, to the following parties of interest this 28<sup>th</sup> day of February, 2001.

Richard Collier  
General Counsel, Tennessee Regulatory Authority  
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Timothy C. Phillips  
Office of Attorney General and Reporter  
Consumer Advocate Division  
Cordell Hull Building  
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**CONFIDENTIAL**

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